

EXHIBIT D

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11 (Subchapter V)
SHARITY MINISTRIES, INC., ¹)	
)	Case No. 21-11001 (JTD)
Debtor.)	
)	

AFFIDAVIT OF TISHA SAVANNAH

Before me, the undersigned authority, personally appeared Tisha Savannah who, being
by me duly sworn, deposed as follows:

“My name is Tisha Savannah I am over the age of eighteen, of sound mind, capable of making this affidavit, and personally acquainted with the facts herein stated.

I am employed with the Texas Attorney General’s Office. My current position is that of Legal Assistant.

On July 28, 2021, I visited the following website and looked up cause number D-1-GN-19-003388:

<https://www.traviscountytexas.gov/district-clerk/online-case-information>

The attached document is a true and correct copy of the “Details” page for cause number D-1-GN-19-003388, including the names of the attorneys and clients in this cause.

Further on July 29, 2021, I visited the following website and found Thomas A. Donaho’s profile on the Baker Hostetler website, and a true and correct copy is attached.

<https://www.bakerlaw.com/ThomasADonaho>

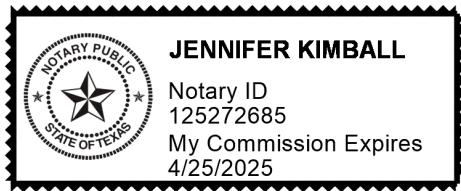
Further, Affiant sayeth naught.”

DocuSigned by:
Tisha Savannah
E12304D54712485...

Tisha Savannah

¹ The last four digits of the Debtor’s federal tax identification number is 0344. The Debtor’s mailing address is 821 Atlanta Street, Suite 124, Roswell, GA 30075.

SWORN TO AND SUBSCRIBED before me on the _29th_ day of _July_____ 2021.



DocuSigned by:
Jennifer Kimball

E77D05E71B25499

Notary Public, State of Texas

Notary w/o Bond

[Austin-Travis County is in Stage 4. View the latest COVID-19 information](#)

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Cause Number	D-1-GN-19-003388
Case Status	CS PN-BNKRPTCY
Style	STATE OF TEXAS V. ALIERA HEALT
Filed Date	6/13/2019
Hearing Date	August 25, 2021 02:00 PM

Attorney	Type	Full/Business Name	First Name	Middle Name	Last Name
DONAHO THOMAS ANDREW	DEFENDANT		WILLIAM	H	THEAD
ARAVIND SANTOSH	DEFENDANT		CHASE		MOSES
NICHOLS ERIC J.R.	DEFENDANT		TIMOTHY	CANDACE	MOSES
ARAVIND SANTOSH	DEFENDANT		SHELLEY	STEELE	MOSES
DONAHO THOMAS ANDREW	DEFENDANT	SHARITY MINISTRIES INC			
GONZALES ALEXANDER J.	DEFENDANT	ALIERA HEALTHCARE INC			
OLESON AIMEE COOK	DEFENDANT	ALIERA HEALTHCARE INC			
CELLA CHRISTINA	PLAINTIFF	STATE OF TEXAS			
HUNKER KATHLEEN THERESA	PLAINTIFF	STATE OF TEXAS			
MATHER H. MELISSA	PLAINTIFF	STATE OF TEXAS			
SWEETEN PATRICK KINNEY	PLAINTIFF	STATE OF TEXAS			
WOLLENZIEN LUCAS HEMENWAY	PLAINTIFF	STATE OF TEXAS			

Event Date	Party Type	Description
7/20/2021	PL	MTN:MOTION

Feedback

TAX RATE: TRAVIS COUNTY ADOPTED A TAX RATE THAT WILL RAISE MORE TAXES FOR MAINTENANCE AND OPERATIONS THAN LAST YEAR'S TAX RATE. THE TAX RATE WILL EFFECTIVELY BE RAISED BY 3.6 PERCENT AND WILL RAISE TAXES FOR MAINTENANCE AND OPERATIONS ON A \$100,000 HOME BY APPROXIMATELY \$11.00.



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Thomas A. Donaho

Partner

Houston

T +1.713.276.1668

F +1.713.751.1717

tdonaho@bakerlaw.com

Overview

Tom Donaho focuses his practice on complex commercial and business litigation. He has experience representing clients in a wide range of contract matters, business torts and real estate disputes. A powerful advocate for his clients in the courtroom, Tom has developed a reputation for efficiently and effectively handling complex litigation disputes.

Tom also has specific experience advising and assisting clients in the energy industry with respect to contractual risk management. He often works with energy companies to develop contracts that serve risk allocation needs through indemnity and insurance protections. He has extensive experience navigating oilfield anti-indemnity statutes across the country, including the Texas Oilfield Anti-Indemnity Act, and regularly gives CLE presentations on the topic.

Experience

- Member of trial team that obtained a unanimous jury verdict after a six-week trial with actual damages of \$72 million. The client, Plaintiff, is a publicly-traded company that filed suit against former executives for breach of fiduciary duty, fraud, and conspiracy. The executives' scheme involved kickbacks in domestic and international transactions as well as numerous efforts to conceal their behavior from compliance and audit.
- Represented an oilfield services company in commercial litigation concerning alleged equipment failure and damages resulting therefrom.
- Represented heavy-truck manufacturer in contract dispute with foreign supplier concerning delivery failures.
- Assisted a heavy equipment manufacturer in defending against strict liability and negligence claims.
- Represented an exploration and production company in arbitrations involving damage to offshore platforms.
- Represented an equipment manufacturer in collecting unpaid and/or overdue bills owed.
- Represented a commercial equipment manufacturer in a dispute concerning alleged equipment failure and economic loss resulting therefrom.
- Counseled an oil and gas client in connection with Chapter 11 bankruptcy proceedings. Representation included an investigation concerning preference actions, secured claims and adversary proceedings.
- Regularly represents contractors and operators alike with respect to contract risk management, well blowouts, onshore and offshore drilling, drafting of commercial oilfield service agreements, joint operating agreements, catastrophic personal injury, exploration, completion, insurance disputes, and bankruptcy.

Indemnity and Contractual Risk Management Experience

- Served as indemnity counsel to oilfield exploration and production company in connection with indemnity demands arising from FLSA dispute.
- Assisted oilfield operator in navigating series of indemnity demands arising from personal injury actions, property damage actions, and regulatory agency investigations.
- Represented an oilfield services company in a contract dispute concerning indemnity obligations specified in an equipment supplier agreement.
- Advised insurance carrier on application of Texas anti-indemnity acts to contractual indemnity provisions.
- Represented oilfield service company in litigation over contractual indemnity obligations following personal injury lawsuit.
- Routinely assists clients in evaluating and responding to indemnity demands.
- Retained to train insurance carrier's underwriters on how to evaluate potential risk arising from contractual indemnity agreements in the energy industry.
- Regularly assists clients in restructuring indemnity provisions in their Master Service Agreements to serve risk allocation needs.

- Drafted oilfield indemnity handbook utilized by practitioners throughout the industry.

News

- 12/10/2012
Madoff Recovery Initiative Marks Fourth Anniversary ... Moves into Fifth Year Still Building Recovery Momentum
- 1/5/2012
The Wall Street Journal showcases BakerHostetler and the "unprecedented magnitude" of the global recovery efforts in article "The Madoff Liquidation, Three Years Later"
- 10/4/2011
Press Release: Initial Interim Distribution of Recovered Funds to Madoff Claims Holders

Press Releases

- 1/4/2021
BakerHostetler Elevates 22 Attorneys to Firm Partnership

Alerts

- 4/7/2020
Preparing for COVID-19 Contract Litigation
- 3/31/2020
Energy Contracts: In-House Counsel, *Force Majeure*, and the COVID-19 Pandemic
- 2/25/2020
Protecting Your Mutual Indemnity Provision from The New Mexico Oilfield Anti-Indemnity Act

Articles

- 4/13/2020
Tom Donaho Article Discusses Protecting Mutual Indemnity Provisions

Community

- City of Spring Valley Village (Elected to City Council in 2017)
- Duke University Young Alumni Development Council

Pro Bono

- Estate planning
- Ad Valorem Tax Disputes

Services

- Commercial Litigation
- Product Liability and Toxic Tort

Industries

- Energy Industry

Prior Positions

- Harris County District Attorney's Office: Intern (2010)

Admissions

- U.S. District Court, Northern District of Texas, 2013
- U.S. District Court, Southern District of Texas, 2012
- Texas

Education

- J.D., The University of Texas School of Law, 2011; Editorial Board, *The Review of Litigation*
- A.B., Political Science, Duke University, 2008